

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

INVENTEL PRODUCTS, LLC, Plaintiff, v. JIMMY LI, LIN AMY, GODADDY.COM LLC, GODADDY INC., SHOPIFY (USA) INC.SHOPIFY INC., INTER CONNECTS INC., PAYPAL, INC., GOOGLE LLC, WU JINZHAO, JOHN/JANE DOE, ABC CORP., Defendants.	No. :19-cv-09190 (WJM) (MF)
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**ORDER TO SHOW CAUSE ON PLAINTIFF'S APPLICATION FOR A TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

This matter comes before the Court upon the application of plaintiff InvenTel Products, LLC ("InvenTel"), by way of Order to Show Cause seeking a temporary restraining order and preliminary injunction, upon notice to defendants. Upon reading and considering the Complaint of Plaintiff, the declaration of Yasir Abdul, and the exhibits attached thereto, together with the accompanying memorandum of law in support thereof, and there having been no prior request for the relief set forth herein:

IT IS HEREBY ORDERED that Defendants JIMMY LI, LIN AMY, GODADDY.COM LLC, GODADDY INC., SHOPIFY (USA) INC., SHOPIFY INC., INTER CONNECTS INC., PAYPAL, INC., GOOGLE LLC, WU JINZHAO, JOHN/JANE DOE, and ABC CORP., ("Defendants") show cause *by written briefs* [REDACTED] [REDACTED]

submitted by April 23, 2019, stating

why an order should not be entered pursuant to Rule 65 of the Federal Rules of Civil Procedure, against Defendants and their respective subsidiaries, affiliates, divisions, officers, directors, principals, servants, employees, successors and assigns, and all those in active concert or participation with them, or under their direct or indirect control, as follows:

1. Preliminarily enjoining and restraining them from imitating, copying, making, publishing, or broadcasting any unauthorized use of InvenTel's copyrighted material including, without limitation, InvenTel's Registered Copyright Nos. PAu003801209, PAu003809586, PAu003811447, PAu0002088600, VAu001245670, VAu001259881, VAu001263676, VAu001249643;

2. Preliminarily enjoining and restraining them from manufacturing, importing, distributing, marketing, advertising, offering for sale and/or selling any product or service bearing any design that is substantially similar to any of InvenTel's copyrighted material including, without limitation, InvenTel's Registered Copyright Nos. PAu003801209, PAu003809586, PAu003811447, PAu0002088600, VAu001245670, VAu001259881, VAu001263676, VAu001249643;

3. Preliminarily enjoining and restraining them from imitating, copying or making unauthorized use of Plaintiff's trademarks, including, without limitation, InvenTel's Trademark, Registration No. 5,426,376;

4. Preliminarily enjoining and restraining them from manufacturing, importing, distributing, marketing, advertising, offering for sale and/or selling any product or service bearing any reproduction, copy, counterfeit, or design confusingly similar to any of Plaintiff's trademarks, including, without limitation, InvenTel's trademark, Registration No. 5,426,376;

5. Prohibiting each of them from transferring, disposing of, or secreting any money, stocks, bonds, real or personal property, or other assets in an amount sufficient to cover three times their profits earned from the sale of HD MIRROR CAM® products bearing the allegedly infringing and counterfeit designs;

6. Directing that, pursuant to the Lanham Act, 15 U.S.C. § 1116 and the Copyright Act, 17 U.S.C. § 503, and the equitable powers of this Court, all products bearing the infringing and/or counterfeit designs be seized and/or impounded, and held by Plaintiff during the pendency of this action;

7. Preliminarily enjoining and restraining all Defendants from continuing to operate or provide any further support, including but limited to registration, hosting, ISP, payment processing, advertising, analytical, or any other support to any of the infringing websites or businesses set forth in this action, namely <https://onlinecheap-shop.myshopify.com>, <https://hdmirrorcamstore.com>, www.ihdmirrorcam.com, www.hdmirrorcamonlinestore.com, and <http://www.hdmirrorcambuy.com>;

IT IS HEREBY FURTHER ORDERED, good cause having been shown therefor, that, ~~pending the hearing on the motion for preliminary injunction, and until the final judgment in this case~~, ^{until April 30, 2019,} Defendants, their respective subsidiaries, affiliates, divisions, officers, directors, principals, servants, employees, successors and assigns, and all those in active concert or participation with them, or under their direct or indirect control, be temporarily restrained from, in any manner, either directly or indirectly:

1. imitating, copying, making, publishing, or broadcasting any of InvenTel's copyrighted material or manufacturing, importing, distributing, marketing, advertising, offering for sale and/or selling any product or service bearing any design that is substantially similar to

any of InvenTel's copyrighted material including, without limitation, InvenTel's Registered Copyright Nos. PAu003801209, PAu003809586, PAu003811447, PAu0002088600, VAu001245670, VAu001259881, VAu001263676, VAu001249643;

2. manufacturing, importing, distributing, marketing, advertising, offering for sale and/or selling any product or service bearing any reproduction, copy, counterfeit, or design confusingly similar to any of Plaintiff's trademarks, including, without limitation, InvenTel's trademark, Registration No. 5,426,376;

3. continuing to operate or provide any further support, including but limited to registration, hosting, ISP, payment processing, advertising, analytical or any other support to any of the infringing websites set forth in this action, namely [https://onlinecheap-](https://onlinecheap-shop.myshopify.com)
[shop.myshopify.com](https://hdmirrorcamstore.com), <https://hdmirrorcamstore.com>, www.ihdmirrorcam.com,
www.hdmirrorcamonlinestore.com, and <http://www.hdmirrorcambuy.com>;
4. secreting and/or dissipating assets, including monies, from their bank and other depository accounts, other than use of such assets by Defendants in the normal course of business; [REDACTED]

*Only as
to
Defendants
Jimmy Li
Lin Amy
and Wu Jinzhao*

IT IS FURTHER ORDERED that security in the amount of \$10,000 be posted by Plaintiff by the 23 day of April, 2019, at 5:00 p.m.

IT IS FURTHER ORDERED that, sufficient cause having been shown therefor, service of this Order, together with the motion papers filed in connection therewith, and the Summons and Complaint, to the extent not already served, shall be deemed effective if completed by the following means:

1. As to Defendants JIMMY LI, LIN AMY, and WU JINZHAO, by email to the addresses listed in the WHOIS Admin listing and/or certified mail to all of the addresses listed in the Complaint;
2. by registered or certified mail or by Federal Express overnight delivery, on each of the Defendants at the addresses set forth for them in the Complaint:
GODADDY.COM LLC, GODADDY INC., SHOPIFY (USA) INC. SHOPIFY INC., INTER CONNECTS INC., PAYPAL, INC., GOOGLE LLC and/or;
3. to the extent that any party has appeared in this action by an attorney by email delivery on any attorney appearing on behalf of such Defendants.

IT IS FURTHER ORDERED that any answering papers shall be served by ~~April 23,~~ April 23, 2019 at 5:00 p.m.; and

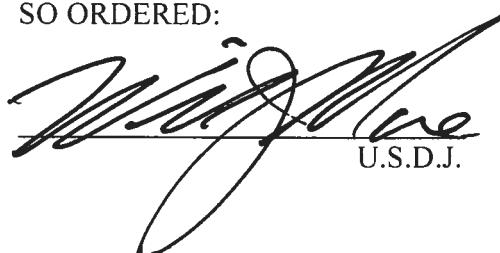
IT IS FURTHER ORDERED that any reply papers shall be served by ~~April 25,~~ April 25, 2019 at 5:00 p.m.

Dated: April ~~18~~, 2019

Time: 10:15 am

4852-4287-8355, v. 1

SO ORDERED:



A handwritten signature consisting of several loops and strokes, appearing to be a stylized form of the letter 'W' or a similar character.

U.S.D.J.